Exhibit G

1 2 3 4 5 6 7	Gary S. Brotman (SBN 287726) gary@marqueelaw.com Diego Gallego Gómez (SBN 337395) diego@marqueelaw.com MARQUEE LAW GROUP, A Professional Corporation 9100 Wilshire Boulevard, Suite 445 East Tower Beverly Hills, California 90212 (310) 275-1844 telephone (310) 275-1801 fax Attorney for Plaintiff					
8	GEARY SHA SUPERIOR COURT OF THE STATE OF CALIFORNIA					
10	COUNTY OF SAN FRANCISCO					
11	GEARY SHA, an individual;	Case No.: CGC-23-606989				
12	Plaintiff,					
13	vs.					
14	AIRCRAFT SERVICE INTERNATIONAL,	PLAINTIFF GEARY SHA'S RESPONSES TO DEFENDANTS' SPECIAL INTERROGATORIES, SET ONE.				
15	INC., a Delaware corporation; MENZIES AVIATION (USA), INC. a Delaware					
16	Corporation; TRACY AGUILAR, an individual; and DOES 1 through 50, inclusive.	Complaint filed: June 9, 2023				
17						
18	Defendants.					
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21	Responding Party: GEARY SHA					
22	Propounding Party: AIRCRAFT SERVICE INTERNATIONAL, INC. et al.					
23	Set Number: One					
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25	Plaintiff Geary Sha hereby responds to the Special Interrogatories (the "Interrogatories")					
26	propounded by Defendants Aircraft Service International Inc., Menzies Aviation (USA), Inc.,					
27	and Tracy Aguilar ("Defendants") as follows:					
28	PLAINTIFF GEARY SHA'S RESPONSES TO DEFENDANTS AIRCRAFT SERVICE INTERNATIONAL, INC.'S ET AL. SPECIAL INTERROGATORIES (SET ONE) 1 Page 100					

PRELIMINARY STATEMENT

These responses to Defendant's Special Interrogatories, Set One, are made solely for the purpose of, and in relation to, this action. Each response is given subject to all appropriate objections (including, but not limited to, objections concerning competency, relevancy, materiality, propriety and admissibility) and all such objections and grounds therefore are reserved and may be interposed at the time of trial.

Responding Party has yet to complete investigation of the facts relating to this action, has not yet completed discovery in this action, and has not yet completed preparation for trial.

Consequently, the following responses are given without prejudice to the right to produce, at the time of trial, subsequently discovered evidence.

Except for facts explicitly admitted in these responses, no admission of any nature whatsoever is to be implied or inferred. The fact that a response has been given should not be taken as an admission, or a concession of the existence of any facts set forth or assumed by the request, or that such response constitutes evidence of any fact thus set forth or assumed. All responses are to be construed on the basis of present recollection.

GENERAL OBJECTIONS

RESPONDING PARTY interposes the following objections to each and every request propounded as follows:

- 1. RESPONDING PARTY objects to this set of Interrogatories, and to each and every Interrogatory contained therein, to the extent it seeks to impose upon RESPONDING PARTY duties beyond those required by the California Code of Civil Procedure.
- 2. RESPONDING PARTY objects to this set of Interrogatories, and each and every Interrogatory contained therein, to the extent it seeks information neither relevant to the claims or defenses on file in the present action, nor admissible, nor reasonably calculated to lead to the discovery of admissible evidence.
- 3. RESPONDING PARTY objects to this set of Interrogatories, and each and every Interrogatory contained therein, to the extent it seeks privileged information, including but not

necessarily limited to information encompassed and protected by the attorney-client privilege and/or the attorney work product privilege.

- 4. RESPONDING PARTY objects to this set of Interrogatories, and each and every Interrogatory contained therein, to the extent it seeks information which constitutes trade secrets, proprietary, or other confidential information.
- 5. RESPONDING PARTY objects to this set of Interrogatories, and each and every Interrogatory contained therein, to the extent that the burden, expense or intrusiveness of the discovery is not outweighed by the likelihood that the information sought will lead to the discovery of admissible evidence.
- 6. RESPONDING PARTY objects to this set of Interrogatories, and each and every Interrogatory contained therein, to the extent that the discovery sought is unreasonably cumulative or duplicative of other discovery propounded in this action.
- 7. RESPONDING PARTY objects to this set of Interrogatories, and each and every Interrogatory contained therein, to the extent that the information sought is (a) in Propounding Party's possession, custody or control, (b) outside RESPONDING PARTY'S possession, custody or control, or (c) equally or more accessible to Propounding Party, as a matter of public record or otherwise.
- 8. RESPONDING PARTY objects to this set of Interrogatories, and each and every Interrogatory contained therein, to the extent that the information sought is unduly burdensome or expensive in light of the needs of the case and the amount in controversy.
- 9. RESPONDING PARTY objects to this set of Interrogatories, and each and every Interrogatory contained therein, to the extent that the discovery seeks information that is outside the scope of permissible discovery.
- 10. RESPONDING PARTY objects to this set of Interrogatories, and each and every Interrogatory contained therein, to the extent it may cause unwarranted annoyance, embarrassment, oppression, or undue burden and expense.
- 11. RESPONDING PARTY objects to this set of Interrogatories, and each and every Interrogatory contained therein, to the extent it seeks legal or expert conclusions or opinions.

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SPECIAL INTERROGATORY NO. 1:

- Please state the names, addresses and phone numbers of all persons who YOU contend are witnesses to the allegations contained in YOUR COMPLAINT.
- **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

Objection. RESPONDING PARTY objects to the extent this interrogatory contains subparts and is a compound, conjunctive, and/or disjunctive request. RESPONDING PARTY objects to this interrogatory to the extent that it seeks the contact information of its own

PLAINTIFF GEARY SHA'S RESPONSES TO DEFENDANTS AIRCRAFT SERVICE INTERNATIONAL, INC.'S ET AL. SPECIAL INTERROGATORIES (SET ONE)

- 13. RESPONDING PARTY objects to this set of Interrogatories, and each and every Interrogatory contained therein, to the extent it is overly broad, vague, ambiguous, or otherwise unintelligible.
- 14. RESPONDING PARTY'S investigation, discovery and preparation for trial is incomplete and will be continuing up to the time of trial in this matter. RESPONDING PARTY has not completed investigation or discovery with respect to all persons who have knowledge or facts upon which the allegations referred to in the requests are based. Accordingly, RESPONDING PARTY will respond to these requests to the extent possible at this time, but each reserves the right to amend or supplement his answers based on further discovery, as well as the right to introduce oral and documentary evidence at any motion or trial of this action which is in addition to or different from the evidence described in these responses.

Without in any way waiving such objections, RESPONDING PARTY responds to the discovery request as follows:

employees, which is equally available to the Propounding Party. RESPONDING PARTY objects to this request to the extent that it calls for a legal conclusion. RESPONDING PARTY objects to this discovery to the extent that it seeks to elicit information protected by the attorney/client privilege and the attorney work product doctrine obtained in anticipation of litigation.

RESPONDING PARTY objects to this interrogatory to the extent that it calls for information protected by any privilege or constitutional, statutory or common laws. RESPONDING PARTY specifically reserves the right to raise additional objections by way of privilege (whether constitutional, statutory or common law) or otherwise

Subject to and without waiving the aforementioned objections, RESPONDING PARTY responds as follows: Rowena Cariola, Tracy Aguilera, Human Resources Manager, 730 N. McDonnell Road, San Francisco, CA 94128, (650) 745-1618; (415) 850-9699.

RESPONDING PARTY'S investigation into this matter is still in its preliminary stages and RESPONDING PARTY'S investigation is ongoing. Therefore, RESPONDING PARTY reserves the right to supplement this response at a later date.

SPECIAL INTERROGATORY NO. 2:

Please state with particularity the knowledge that each alleged witness to YOUR COMPLAINT has that is in any way relevant to the allegations contained in YOUR COMPLAINT.

RESPONSE TO SPECIAL INTERROGATORY NO. 2:

Objection. RESPONDING PARTY objects to this request to the extent it is over broad, unduly burdensome, oppressive. RESPONDING PARTY objects that this interrogatory calls for information equally, if not more, available to PROPOUNDING PARTY. RESPONDING PARTY objects to this discovery to the extent that it seeks to elicit information protected by the attorney/client privilege and the attorney work product doctrine obtained in anticipation of litigation. RESPONDING PARTY objects to this interrogatory to the extent that it calls for information protected by any privilege or constitutional, statutory or common laws.

RESPONDING PARTY specifically reserves the right to raise additional objections by way of privilege (whether constitutional, statutory or common law) or otherwise.

Without waiving the aforementioned objections, RESPONDING PARTY responds as

1 2 follows: Rowena Cariola and Tracy Aguilera have first-hand knowledge regarding 3 RESPONDING PARTY'S requests for medical leave as well as his termination as Aguilera was 4 RESPONDING PARTY'S point of contact and the one who informed RESPONDING PARTY that his leave was approved and that he was terminated. Aguilera was the one who refused to 5 allow RESPONDING PARTY to return to his position, offered RESPONDING PARTY entry-6 7 level jobs and who informed him that he could apply to out of state/out of country managerial 8 positions. Lastly, Aguilera is the one who terminated RESPONDING PARTY and classified it as 9 a voluntary resignation despite RESPONDING PARTY'S constant objections that he was not

RESPONDING PARTY'S investigation into this matter is still in its preliminary stages and RESPONDING PARTY'S investigation is ongoing. Therefore, RESPONDING PARTY

voluntarily resigning.

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SPECIAL INTERROGATORY NO. 3:

Please state each and every item of damages that YOU claim YOU suffered by reason of the occurrences that form the subject matter of YOUR COMPLAINT.

RESPONSE TO SPECIAL INTERROGATORY NO. 3:

reserves the right to supplement this response at a later date.

Objection. Vague and ambiguous as to "damages". RESPONDING PARTY objects to this request to the extent it is over broad, unduly burdensome, oppressive. RESPONDING PARTY objects to the extent this interrogatory contains subparts and is a compound, conjunctive, and/or disjunctive request. RESPONDING PARTY objects to this discovery to the extent that it seeks to elicit information protected by the attorney/client privilege and the attorney work product doctrine obtained in anticipation of litigation. RESPONDING PARTY objects to this interrogatory to the extent this interrogatory violates RESPONDING PARTY'S right of privacy, including financial privacy, which is guaranteed by Article I, Section 1 of the California Constitution. RESPONDING PARTY objects to this interrogatory to the extent that it calls for information protected by any privilege or constitutional, statutory or common laws.

RESPONDING PARTY specifically reserves the right to raise additional objections by way of privilege (whether constitutional, statutory or common law) or otherwise.

Without waiving the aforementioned objections, RESPONDING PARTY responds as follows:

- 1) Lost past earnings: \$73,192 (\$81,000 (\$9,000 monthly salary x 9 months (January September)) \$7,808 YTD earnings at new job).
- 2) Lost future earnings: **\$1,254,000** [(\$108,000 yearly salary x 33 years = \$3,564,000) \$70,000 yearly salary x 33 years = \$2,310,000)].
- 3) Lost future bonuses: \$356,400 (yearly bonus estimated at \$10,800 x 33 years).
- 4) Lost past benefits (medical, dental, vision): Approximately \$13,500 (benefits estimated at \$1,500/mon x 9 months to cover RESPONDING PARTY and 3 dependents).
- 5) Lost future benefits (medical, dental, vision): Approximately \$594,000 (benefits estimated at \$1,500/mon x 33 years to cover RESPONDING PARTY and 3 dependents).
- 6) Punitive damages to punish and deter the malicious, despicable, willful, and wrongful actions taken by Defendants due to the disability discrimination, Defendant's failure to prevent, investigate, and/or remedy the discrimination and retaliation, and wrongful termination;
- 7) General damages due to the discriminatory and retaliatory actions taken by Defendants as set forth in RESPONDING PARTY'S complaint;
- 8) Compensation for attorneys' fees and costs under RESPONDING PARTY'S claims for disability discrimination, retaliation, and Defendant's failure to prevent, investigate, and/or remedy the discrimination and retaliation, the amount of which shall be submitted upon completion of the matter in its entirety.

RESPONDING PARTY'S investigation into this matter is still in its preliminary stages and RESPONDING PARTY'S investigation is ongoing. Therefore, RESPONDING PARTY reserves the right to supplement this response at a later date.

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SPECIAL INTERROGATORY NO. 4:

Please IDENTIFY any and all DOCUMENTS that support the existence or amount of any item of damages claimed in Interrogatory No. 3.

RESPONSE TO SPECIAL INTERROGATORY NO. 4:

Objection. RESPONDING PARTY objects to this request to the extent it is over broad, unduly burdensome, oppressive. RESPONDING PARTY objects to the extent this interrogatory contains subparts and is a compound, conjunctive, and/or disjunctive request. RESPONDING PARTY objects to this discovery to the extent that it seeks to elicit information protected by the attorney/client privilege and the attorney work product doctrine obtained in anticipation of litigation. RESPONDING PARTY objects to this interrogatory to the extent this interrogatory violates RESPONDING PARTY'S right of privacy, including financial privacy, which is guaranteed by Article I, Section 1 of the California Constitution. RESPONDING PARTY objects to this interrogatory to the extent that it calls for information protected by any privilege or constitutional, statutory or common laws. RESPONDING PARTY specifically reserves the right to raise additional objections by way of privilege (whether constitutional, statutory or common law) or otherwise.

Subject to and without waiving the aforementioned objections, RESPONDING PARTY responds as follows: Pursuant to C.C.P. § 2030.230, RESPONDING PARTY refers to documents that have been produced during discovery, particularly RESPONDING PARTY'S termination notice, related communications between Aguilera and RESPONDING PARTY, RESPONDING PARTY'S payroll records and mitigation efforts. See Exhibits A - C.

RESPONDING PARTY'S investigation into this matter is still in its preliminary stages and RESPONDING PARTY'S investigation is ongoing. Therefore, RESPONDING PARTY reserves the right to supplement this response at a later date.

SPECIAL INTERROGATORY NO. 5:

Please state the names, addresses and phone numbers of all psychologists, psychoanalysts, and/or psychotherapists that YOU have visited in the last 10 years.

RESPONSE TO SPECIAL INTERROGATORY NO. 5:

Objection. RESPONDING PARTY objects to this request to the extent it is over broad, unduly burdensome, oppressive. RESPONDING PARTY objects to the extent this interrogatory contains subparts and is a compound, conjunctive, and/or disjunctive request. RESPONDING PARTY objects to this interrogatory to the extent that the discovery seeks information that is outside the scope of permissible discovery. RESPONDING PARTY objects to this interrogatory to the extent that it seeks to elicit information protected by the attorney/client privilege and the attorney work product doctrine obtained in anticipation of litigation. RESPONDING PARTY objects to this interrogatory to the extent that it seeks information protected by the right of privacy under Article I, Section 1 of the California Constitution. The constitutional right to privacy also applies to a party's medical records. (John B. v. Superior Court (Bridget B., (2006)) 38 Cal.4th 1177, 1198). This interrogatory further violates the physician-patient privilege. RESPONDING PARTY objects to this interrogatory to the extent that it calls for information protected by any privilege or constitutional, statutory or common laws. RESPONDING PARTY specifically reserves the right to raise additional objections by way of privilege (whether constitutional, statutory or common law) or otherwise. Due to the aforementioned objections, RESPONDING PARTY is unable to provide a response.

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SPECIAL INTERROGATORY NO. 6:

Please IDENTIFY any and all steps YOU have taken to mitigate any damages YOU have allegedly incurred.

RESPONSE TO SPECIAL INTERROGATORY NO. 6:

Objection. Vague and ambiguous as to "IDENTIFY". RESPONDING PARTY objects to this request to the extent it is over broad, unduly burdensome, oppressive. RESPONDING PARTY objects to this discovery to the extent that it seeks to elicit information protected by the PLAINTIFF GEARY SHA'S RESPONSES TO DEFENDANTS AIRCRAFT SERVICE INTERNATIONAL, INC.'S ET AL. SPECIAL INTERROGATORIES (SET ONE)

attorney/client privilege and the attorney work product doctrine obtained in anticipation of litigation. RESPONDING PARTY objects to this request to the extent this interrogatory violates RESPONDING PARTY'S right of privacy, including financial privacy, which is guaranteed by Article I, Section 1 of the California Constitution. RESPONDING PARTY objects to this interrogatory to the extent that it calls for information protected by any privilege or constitutional, statutory or common laws. RESPONDING PARTY specifically reserves the right to raise additional objections by way of privilege (whether constitutional, statutory or common law) or otherwise.

Subject to and without waiving the aforementioned objections, RESPONDING PARTY responds as follows: Pursuant to C.C.P. § 2030.230, RESPONDING PARTY refers to documents that have been produced during discovery, particularly documents reflecting RESPONDING PARTY'S mitigation efforts. Please see Exhibit C.

RESPONDING PARTY'S investigation into this matter is still in its preliminary stages and RESPONDING PARTY'S investigation is ongoing. Therefore, RESPONDING PARTY reserves the right to supplement this response at a later date.

SPECIAL INTERROGATORY NO. 7:

Please IDENTIFY all employment positions for which YOU have applied since January 3, 2023.

RESPONSE TO SPECIAL INTERROGATORY NO. 7:

Objection. Vague and ambiguous as to "IDENTIFY". RESPONDING PARTY objects to this request to the extent it is over broad, unduly burdensome, oppressive. RESPONDING PARTY objects to this discovery to the extent that it seeks to elicit information protected by the attorney/client privilege and the attorney work product doctrine obtained in anticipation of litigation. RESPONDING PARTY objects to this request to the extent this interrogatory violates RESPONDING PARTY'S right of privacy, including financial privacy, which is guaranteed by Article I, Section 1 of the California Constitution. RESPONDING PARTY objects to this interrogatory to the extent that it calls for information protected by any privilege or constitutional, statutory or common laws. RESPONDING PARTY specifically reserves the right

to raise additional objections by way of privilege (whether constitutional, statutory or common law) or otherwise.

Subject to and without waiving the aforementioned objections, RESPONDING PARTY responds as follows: Pursuant to C.C.P. § 2030.230, RESPONDING PARTY refers to documents that have been produced during discovery, particularly documents reflecting RESPONDING PARTY'S mitigation efforts. Please see Exhibit C.

RESPONDING PARTY'S investigation into this matter is still in its preliminary stages and RESPONDING PARTY'S investigation is ongoing. Therefore, RESPONDING PARTY reserves the right to supplement this response at a later date.

SPECIAL INTERROGATORY NO. 8:

Please IDENTIFY all employment positions YOU have held since January 3, 2023.

RESPONSE TO SPECIAL INTERROGATORY NO. 8:

Objection. Vague and ambiguous as to "IDENTIFY". RESPONDING PARTY objects to this request to the extent it is over broad, unduly burdensome, oppressive. RESPONDING PARTY objects to this discovery to the extent that it seeks to elicit information protected by the attorney/client privilege and the attorney work product doctrine obtained in anticipation of litigation. RESPONDING PARTY objects to this request to the extent this interrogatory violates RESPONDING PARTY'S right of privacy, including financial privacy, which is guaranteed by Article I, Section 1 of the California Constitution. RESPONDING PARTY objects to this interrogatory to the extent that it calls for information protected by any privilege or constitutional, statutory or common laws. RESPONDING PARTY specifically reserves the right to raise additional objections by way of privilege (whether constitutional, statutory or common law) or otherwise.

Subject to and without waiving the aforementioned objections, RESPONDING PARTY responds as follows: Account Manager for Alliance Ground International.

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RESPONDING PARTY'S investigation into this matter is still in its preliminary stages and RESPONDING PARTY'S investigation is ongoing. Therefore, RESPONDING PARTY reserves the right to supplement this response at a later date.

SPECIAL INTERROGATORY NO. 9:

For each position identified in YOUR response to Interrogatory No. 8, state (a) the date on which YOU were hired, (b) YOUR job position, (c) YOUR hourly wage, and (d) the date on which YOU were terminated or the position ended.

RESPONSE TO SPECIAL INTERROGATORY NO. 9:

Objection. Vague and ambiguous as to "identified". RESPONDING PARTY objects to this request to the extent it is over broad, unduly burdensome, oppressive. RESPONDING PARTY objects to the extent this interrogatory contains subparts and is a compound, conjunctive, and/or disjunctive request. RESPONDING PARTY objects to this discovery to the extent that it seeks to elicit information protected by the attorney/client privilege and the attorney work product doctrine obtained in anticipation of litigation. RESPONDING PARTY objects to this request to the extent this interrogatory violates RESPONDING PARTY'S right of privacy, including financial privacy, which is guaranteed by Article I, Section 1 of the California Constitution. RESPONDING PARTY objects to this interrogatory to the extent that it calls for information protected by any privilege or constitutional, statutory or common laws.

RESPONDING PARTY specifically reserves the right to raise additional objections by way of privilege (whether constitutional, statutory or common law) or otherwise.

Subject to and without waiving the aforementioned objections, RESPONDING PARTY responds as follows: (a) – (d): July 25, 2023; Account Manager; \$70,000/year; still employed.

RESPONDING PARTY'S investigation into this matter is still in its preliminary stages and RESPONDING PARTY'S investigation is ongoing. Therefore, RESPONDING PARTY reserves the right to supplement this response at a later date.

VERIFICATION

I am a party to this action, and I have read the foregoing PLAINTIFF GEARY SHA'S RESPONSES TO DEFENDANTS' SPECIAL INTERROGATORIES, SET ONE and know its contents. The matters stated in said document are true based on my own knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true.

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GEARY SHA

VERIFICATION

1 PROOF OF SERVICE I declare that I am over the age of eighteen (18) and not a party to this action. My business 2 address is 9100 Wilshire Boulevard, Suite 445, East Tower, Beverly Hills, California 90212. 3 On September 29, 2023 I served the foregoing document(s) described as: 4 PLAINTIFF GEARY SHA'S RESPONSES TO DEFENDANTS' SPECIAL INTERROGATORIES, SET ONE. 5 6 on all interested parties in this action by transmitting a true copy of the document(s) described above, addressed as follows: 7 SEE ATTACHED SERVICE LIST 8 () BY MAIL as follows: I am "readily familiar" with the firm's practice of collection and 9 processing of correspondence for mailing with the United States Postal Service. I know that the correspondence was deposited with the United States Postal Service on the same 10 day this declaration was executed in the ordinary course of business. I know that the envelope was sealed and, with postage thereon fully prepaid, placed for collection and 11 mailing on this date in the United States mail at Beverly Hills, California. 12 () **BY PERSONAL SERVICE:** I caused to be delivered such envelope by hand to the above addressee(s). 13 BY OVERNIGHT COURIER: I am "readily familiar" with the firm's practice of () 14 collecting and processing overnight deliveries, which includes depositing such packages in a receptacle used exclusively for overnight deliveries. The packages were deposited 15 before the regular pickup time and marked accordingly for delivery the next business day. 16 (X) BY ELECTRONIC TRANSMISSION: Participants in this case were served electronically to the address of the recipient(s) as set forth below. I am readily familiar 17 with the Code of Civil Procedure and California Rules of Court for electronic service and this document/these documents were duly served electronically in accordance with said 18 rules and regulations on the date stated above, and the transmission was reported as complete and without error. 19 20 I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on September 29, 2023 at Beverly Hills, California. 21 22 Kimberly Gomez Garcia Kimberly Comez Garcia 23 24 25 26 27

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	Case 3:24-cv-01738-EMC	Document 1-8	Filed 03/20/24	Page 17 of 17
1				
2 3 4	SERVICE LIST: FOLEY & LARDNER LLP			endant AIRCRAFT SERVICE
5	c/o Christopher Ward, Esq. c/o Kevin Jackson, Esq. 555 South Flower Street, Suite 3300		INTERNATIONAL, INC.; MENZIES AVIATION (USA), INC.; and TRACY AGUILAR	
6	Los Angeles, CA 90071 E: cward@foley.com;			
7 8	kjackson@foley.com; SMoreno@foley.com			
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